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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR 12-0090 RS and
	)	NO. CR 12-0156 RS
Plaintiff,	)	
	)	
v.	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	EXCLUDING TIME UNDER 18 U.S.C. § 3161
PABLO PEREZ-ANGUIANO,	)	
a/k/a Jose Escalera Aguilera	)	
	)	
	)	
Defendant.	)	

The parties in this case appeared before the Court on October 15, 2013. At that time, defense counsel represented that additional time would be required to consult with her client and reach a possible resolution in the case with the government. As a result, the Court set the matter to November 5, 2013. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

The parties have agreed to exclude the period of time between October 15, 2013, and November 5, 2013, from any time limits applicable under 18 U.S.C. § 3161. The parties agreed that granting the exclusion would maintain continuity of counsel and allow the reasonable time necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agreed that the ends of Stipulation and ~~[Proposed]~~ Order Excluding Time  
CR 12-0156 RS

1 justice served by granting such an exclusion of time outweigh the best interests of the public and the  
2 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). At the hearing, the Court made findings  
3 consistent with this agreement.

4 SO STIPULATED:

5 MELINDA HAAG  
United States Attorney

7 DATED: October 15, 2013

8 /s/  
CAROLYN SILANE  
Special Assistant United States Attorney

10 DATED: October 15, 2013


11 /s/  
CANDIS MITCHELL  
Attorney for Defendant Pablo Perez-Anguiano

1 ~~PROPOSED~~ ORDER

2 For the reasons stated above and at the October 15, 2013, hearing, the Court finds that the  
3 exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from October 15, 2013,  
4 to November 5, 2013, is warranted and that the ends of justice served by the continuance outweigh the  
5 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Denying the  
6 requested exclusion of time would deprive the parties of the reasonable time necessary for effective  
7 preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

8  
9 IT IS SO ORDERED.

10  
11 DATED: 10/16/13

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13 HONORABLE RICHARD SEEBORG  
14 United States District Court Judge  
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